

National Aeronautics and
Space Administration

George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



June 29, 2006

Reply to Attn of: LS01(PAB)

MEMORANDUM FOR RECORD

FROM: LS01/James R. Frees

SUBJECT: Blanket approval for MSFC Senior Institutional and those with Project Responsibilities to Attend a Pre-launch Reception Co-sponsored by NASA Stennis Space Center and Pratt-Whitney Rocketdyne

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

MSFC employees with senior institutional or project responsibilities with regard to the Space Shuttle Program have been invited to attend a pre-launch reception co-sponsored by NASA Stennis Space Center and Pratt-Whitney Rocketdyne at the Hilton Hotel, Cocoa Beach, Florida, Friday, June 30, 2006. This event is to be held in conjunction with the launch of STS-121, at the Kennedy Space Center.

This event will be a widely-attended gathering of aerospace industry representatives, and Federal and State elected officials. The reception is valued at \$16 per person and approximately 150 individuals have been invited to attend. The reception is fully funded by Pratt-Whitney Rocketdyne. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Pratt-Whitney Rocketdyne is a contractor company that is currently involved in contractual matters relating to NASA. Some MSFC personnel invited to attend this event presently, or may in the near future, have extensive involvement in matters relating to Pratt-Whitney Rocketdyne's business interests. These personnel include the MSFC Center Director, Manager, Shuttle Propulsion Office, Manager, Space Shuttle Main Engine Project, and Manager, MSFC Resident Office at the Michoud Assembly Facility, all of whom have been invited to attend this event. These personnel are similarly situated in that they each have senior institutional or project responsibilities that could significantly influence current or future Pratt-Whitney Rocketdyne contracts.

I have determined that free attendance of these senior institutional and project leaders at the pre-launch reception is in the interests of the agency because it will further agency programs and operations. This event is co-sponsored by MSFC and the attendance of these senior NASA employees at the event will help to raise NASA's profile with

national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information concerning its activities.

The total per-person cost for the event is estimated at \$16. Given the purpose of the event, the alignment of the pre-launch reception's interests with NASA's, the broad attendance anticipated, and the modest market value of these social events, I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. Free attendance by employees whose duties do not substantially affect the sponsors is addressed in a separate determination.

Questions about this determination may be addressed to Pamela A. Bourque at 256-544-0024.


James R. Frees
Acting Chief Counsel